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**OF BOILER AND
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INSPECTORS**

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July 12, 2007

Dr. Ted Willke
Associate Administrator for
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East Building, 2nd Floor
Washington, D.C. 20590-0001

DEPT. OF TRANSPORTATION
DOCKETS

2007 JUL 20 P 1:00

PHMSA-2007-28809-1

Subject: US DOT Regulatory Adoption of the National Board Inspection Code (NBIC) Requirements for Continued Service Inspections, Repairs and Modifications of Transport Tanks – 2007 Edition

Dear Dr. Willke:

The National Board of Boiler and Pressure Vessel Inspectors respectfully requests that the US Department of Transportation consider regulatory adoption of the National Board Inspection Code into §171.8 of Title 49, Code of Federal Regulations.

Appendix L – Continued Service Inspection, and Repair for DOT Vessels was incorporated in the 2004 Edition of the National Board Inspection Code with publication of the 2005 Addenda. This appendix provides rules for continued service inspections, repairs and modifications of transport tanks, including methods to be used and criteria for inspections, reports, document control and inspector duties and responsibilities. The term “inspector” includes Authorized Inspector (AI), Qualified Inspector (QI), Certified Individual (CI) or Registered Inspector (RI) to address all aspects of continued service.

The 2007 Edition of the National Board Inspection Code will be restructured into three parts: Part 1 – Installation; Part 2 – Inspection; and Part 3 – Repairs and Alterations. All requirements of Appendix L will be relocated into Part 2 – Inspection and Part 3 – Repairs and Alterations. This will provide for future development and growth.

I would be pleased to meet with you to discuss this request or answer any questions you might have.

Sincerely,

Donald E. Tanner
Executive Director

DET/hkd